

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Durable Coatings - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Time-Critical Removal Action Begins
Durable Coatings
C521
Northville, MI
Latitude: 42.4079705 Longitude: -83.4691435

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From: Jeffrey Lippert, On-Scene Coordinator

Date: 9/15/2011

Reporting Period: 09/08/2011 - 09/16/2011

US EPA RECORDS CENTER REGION 5



412816

1. Introduction

1.1 Background

Site Number:	C521	Contract Number:	
D.O. Number:		Action Memo Date:	8/25/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	

Mobilization Date:	9/8/2011	Start Date:	9/8/2011
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000510557	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Site consists of a 4.15-acre parcel bordered by Northville Road and Hines park to the west, commercial properties to the north and south, and railroad tracks and residential homes to the east. The Site is the former location of Durable Coatings and includes a building with an office area and a number of other additions totaling 57,864 square feet. Durable Coatings Corporation used the Site for electro-coating services, including rust-preventative coating, corrosion-resistant coating, and metal finishing services. The Site is no longer operational.

1.1.2.1 Location

The Site is located at 16500-16580 Northville Road in Northville, Wayne County, Michigan 48168 in a mixed residential/commercial/industrial area. Coordinates for the Site are 42.3945 degrees north and -83.4681 degrees west. The Middle Rouge River is immediately south of the Site and is approximately 60 feet from the building. Several other water bodies are located within a one-mile radius of the Site, including Waterford Pond and Phoenix Lake. Meads Middle School is located approximately 750 feet to the northeast of the Site.

1.1.2.2 Description of Threat

The Toxicity Characteristic Leaching Procedure (TCLP) results for a drum at the Site which contains methyl ethyl ketone (MEK) were 17,000 milligrams per liter (mg/L) which is 85 times above what is characteristically hazardous for MEK. This same drum has a flash point of 50 degrees Fahrenheit ($^{\circ}$ F); 90° F below what is characteristically hazardous. In addition, a corrosive substance in a drum at the Site had a pH of 14.0 standard units (S.U.) A drum marked as "hydrochloric acid" produced visible acid vapor fumes when opened. Fumes from this drum produced a pH of zero S.U. on field screening equipment.

The Site building is in a state of disrepair. Numerous holes in the roof and walls of the building allow precipitation to enter. This precipitation will lead to the further degradation of Site containers and contribute to the likelihood of release. Similarly, gas service has been cut-off to the building and no heat is available. Freezing of the chemicals on-site can lead to expansion and bulging of the containers and increase the likelihood of release. Lastly, the building currently sits vacant and perimeter fencing is incomplete which can lead to trespassers. Trespassers have the potential to cause an accidental or purposeful release to the environment. The Middle Rouge River lies approximately 60 feet from the building.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

During a initial site visit with MDEQ, U.S. EPA observed the worker wearing no PPE, signs of liquid waste on his hands and clothes, and smoking cigarettes. When questioned, the worker stated that he had been transferring contents of containers into other containers and that he had no OSHA hazardous waste training. Multiple signs of spills were observed in the building including puddles and pools of liquid waste on the floor.

U.S. EPA conducted a site assessment on June 17, 2011 of Durable Coatings. U.S. EPA documented the presence of over 390 containers, including drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers. Labels on some containers indicated the potential presence of hydrochloric, acetic, nitric, sulfuric, and phosphoric acids, sodium hydroxide; potassium hydroxide; n-methylene chloride; dichloromethane; propane; oxygen; acetylene; glycol ether; and cellulose solvent.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

U.S. EPA met MDEQ at the Durable Coatings Site on May 19, 2011 to conduct a Site walk-through. U.S. EPA observed numerous drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers strewn throughout the Site. A large number of the containers were observed to be unlabeled and unsecured. One worker was on-site. The worker was wearing no personal protective equipment (PPE), had visual signs of waste on his hands and clothes, had no Occupational Safety and Health Administration (OSHA) hazardous waste training, and was smoking cigarettes. Multiple signs of spills were observed in the building including puddles and pools of liquid waste on the floor. The worker stated that he was preparing the waste for disposal and made mention of transferring contents of containers into other containers.

U.S. EPA conducted a site assessment on June 17, 2011 of Durable Coatings. U.S. EPA documented the presence of over 390 containers, including drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers. Labels on some containers indicated the potential presence of hydrochloric, acetic, nitric, sulfuric, and phosphoric acids, sodium hydroxide; potassium hydroxide; n-methylene chloride; dichloromethane; propane; oxygen; acetylene; glycol ether; and cellulose solvent.

2.1.2 Response Actions to Date

On Thursday, September 8, 2011, U.S. EPA mobilized to the site and began connecting electricity.

On Friday, September 9, 2011, U.S. EPA completed wiring and electrical connection.

On Monday, September 12, 2011, U.S. EPA began securing the site and setting up and delineating work zones, the contaminant reduction zone, and the decontamination area. Equipment was delivered to the site including: a skid steer, an air compressor, office equipment, and a storage trailer.

On Tuesday, September 13, 2011, U.S. EPA continued site setup and began removing debris piles from work areas and placing it in a 40-CY roll-off box for disposal. U.S. EPA began moving empty drums and containers into the south area of the building, and moving containers containing waste into the drum storage area in the center portion of the building. Two cylinders of R-22 refrigerant were transported for recycling to Golden Refrigerant in Livonia, Michigan.

U.S. EPA conducted air monitoring during work activities. No readings above action levels were detected.

On Wednesday, September 14, 2011, No work was conducted on this day due to a power outage in Northville Township.

On Thursday, September 15, 2011, U.S. EPA continued removing debris from work zones, segregating empty containers and those containing wastes into the respective areas. U.S. EPA conducted air monitoring during work activities. No readings above action levels were detected.

On Friday, September 16, 2011, U.S. EPA continued removing debris from work zones, segregating empty containers and those containing wastes into the respective areas. Golden Refrigerant was on-site and removed R-22 refrigerant from two large, abandoned, air conditioning units. A total of 22 pounds of refrigerant was recovered and recycled.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Enforcement Team continues to look at PRPs. General Notice Letters have been sent to two PRPs along with 104e letters. Means of reimbursing U.S. EPA's cleanup costs are being looked into.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
R-22 Refrigerant	Cylinders	2	N/A	Recycled at Golden Refrigerant, Livonia, MI	
R-22 Refrigerant	lbs	22	N/A	Recycled at Golden Refrigerant, Livonia, MI	

2.2 Planning Section

2.2.1 Anticipated Activities

Continue segregating empty containers

Continue staging containers and drums containing wastes into the drum storage area.

Continue removing debris from work areas and placing it into roll-off boxes for disposal.

Begin collecting samples from containers for hazard categorization.

2.2.1.1 Planned Response Activities

Segregate containers

Sample containers

Combine compatible wastes into appropriate waste streams

Waste disposal

2.3 Logistics Section

Not Applicable.

2.4 Finance Section

2.4.1 Narrative

An Action Memorandum was signed by the Superfund Division Director on August 25, 2010 to conduct a fund-lead time-critical removal action at the site.

2.5 Safety Officer

Ed Kiernicki

2.6 Liaison Officer

Not Applicable.

2.7 Information Officer

2.7.1 Public Information Officer

Not Applicable.

2.7.2 Community Involvement Coordinator

Not Applicable.

3. Participating Entities

3.1 Unified Command

Unified Command will not be utilized for the Durable Coatings Site.

3.2 Cooperating and Assisting Agencies

MDEQ

4. Personnel On Site

ERRS – 4

START – 1

U.S. EPA – 1

5. Definition of Terms

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act
CIC - Community Involvement Coordinator
MDEQ - Michigan Department of Environmental Quality
NCP - National Contingency Plan
OSC - On Scene Coordinator
START - Superfund Technical Assessment and Response Team
ppb - parts per billion
ppm - parts per million
RCRA - Resource Conservation and Recovery Act
U.S. EPA - United States Environmental Protection Agency
VOC - Volatile organic compound
WESTON - Weston Solutions, Inc.

6. Additional sources of information

6.1 Internet location of additional information/reports

None.

6.2 Reporting Schedule

Polreps will be issued as necessary.

7. Situational Reference Materials

None.





